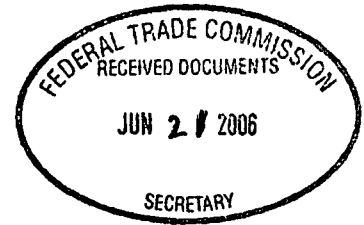


Federal Trade Commission/
Office of the Secretary,
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580



RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Business Developer with The Country Club Biz. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to continue to do business.

I believe, that like myself, most Multi Level Marketers have tried numerous companies with varying degrees of success and even failure. Because a business venture did not work out does not mean anyone was defrauded; usually others have succeeded in the same business. Most **successful** business people have had failures. Failures are the foundation of our successes! Please do not totally hamstring the opportunities of future successful businesses.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Distributors in a home business. Our sales kit only costs \$99. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because our company already has a 100% money-back guarantee for those new distributors who decide this business is not for

them. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about The Country Club Biz and will then need to send in many reports to my company headquarters.

We as business and community leaders have the responsibility to help people to be self-sufficient, so they can provide better for their families, spend more money in their communities, donate more money to charities, and donate more to keep worthy politicians in office to help this country move forward. The single best way for people to provide for themselves is through a home business. And it is our responsibility as leaders to make it easier for people to start and maintain a business - it is extremely counter-productive to make it **more** difficult for people to start and maintain a home business.

The proposed rule calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless my company is actually found guilty of something. Otherwise, my business and I are put at an unfair advantage even though we have done **nothing** wrong.

The proposed rule would also require the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (even with their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to my company's headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many

people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met. Wouldn't you?

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended harmful consequences and there are less burdensome alternatives available to achieving your goals. Fraudulent, crooked people are presently violating numerous laws and regulations already on the books. They will not hesitate to break these proposed new laws as well. So I ask that any new laws or regulations be carefully considered so as not to unduly burden legitimate, honest business men and women.

Thank you for your time in considering my comments.

Respectfully,

[REDACTED]
[REDACTED]
Richard E. Dennis
[REDACTED]
[REDACTED]